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May 13, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Superb Motors Inc., et al. v. Deo, et al.
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

Together with Milman Labuda Law Group PLLC and Cyruli Shanks Zizmor LLP, this office represents the Plaintiffs in the above-referenced case.

Plaintiffs write to respectfully request leave of this Court to file a reply memorandum of law in further support of their cross-motion for leave to amend the pleadings vis-à-vis Defendants'¹ five (5) separate motions to dismiss in excess of the 2,500 word count limit for reply memoranda set forth in ¶ (C)(2) of this Court's Individual Practice Rules.

Plaintiffs respectfully submit that good cause exists to enlarge the word count limit to 10,000 words to adequately address the arguments raised by each of the Defendants' arguments in opposition to Plaintiffs' cross-motion. Plaintiffs' brief currently stands at 9,499 words but some cushion is sought to permit the Plaintiffs to make any final revisions. Accordingly, Plaintiffs' request for leave to enlarge the word count limit up to 10,000 words should be granted.

Plaintiffs thank this Court for its continued time and attention to this matter.

Dated: Lake Success, New York
May 13, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
May 13, 2024

SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.

Attorneys for Plaintiffs
Superb Motors Inc.
Team Auto Sales LLC and
Robert Anthony Urrutia

¹ Apart from Defendant Flushing Bank, who previously filed its motion to dismiss, all remaining Defendants have filed a total of five (5) motions to dismiss. All Defendants – including Flushing Bank – opposed Plaintiffs' cross-motion for leave to amend. As with their opposition papers, Plaintiffs have prepared a combined reply memorandum of law in further support of their cross-motion.

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Dated: New York, New York
May 13, 2024

CYRULI SHANKS & ZIZMOR LLP

/s/ Jeffrey C. Ruderman, Esq.

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